

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

1 June 2005

Mr. F. Andrew Piszkin
BRAC Environmental Coordinator
Base Realignment and Closure
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Irvine, California 92618

Subject: Draft Proposed Plan for Installation Restoration Program (IRP) Sites 3 and 5
Former Marine Corps Air Station, El Toro, California

Mr. Piszkin:

The U.S. Environmental Protection Agency has reviewed the subject draft proposed plan dated April 2005. This proposed plans covers the waste consolidation and landfill capping at IRP Sites 3 and 5. We have the attached comments, many of which are a carryover from our recent review of the draft Feasibility Study Addendum (FSA) Report for IRP Sites 3 and 5, to offer on the document as presented.

If you should have any questions/concerns, please contact me at 415-972-3349.

Sincerely,



Rich Muza, RPM
Superfund Division

cc. Karnig Ohannessian, NFECSW SDIEGO
Content Arnold, NFECSW SDIEGO
Frank Cheng, DTSC
John Broderick, RWQCB
Bob Woodings, RAB
Marcia Rudolph, RAB

received
6/6/05

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**Comments on the Draft Proposed Plan
for Installation Restoration Program (IRP) Sites 3 and 5**

1. General – The document could use a thorough edit. For example, on page 3 the map has labels that are incomplete (ie., missing letters). It is recommended that a thorough edit of the document be completed prior to finalization and release for public comment.

2. Definitions of Chemical and Technical Terms – It is recommended that the terms in bold italics be defined at first occurrence by a footnote as being those that are presented in the glossary. After this footnote, there would be no need to repeat this citation within the text or to provide a definition within the text.

3. Reduction of Toxicity, Mobility, and Volume (Page 13) – The text here states that “none of the proposed alternatives attempts to reduce the volume of the landfill mass” and mentions the potential for mobility due to the generation of leachate; however, the document does not address reduction of toxicity. It is recommended that the text be revised to discuss whether the various alternatives reduce toxicity of the waste.

4. Implementability (Page 13) – “Of the Alternative 4 options, Alternative 4d (preferred remedy) is the easiest to install.” Earlier in this section, it was stated “Alternative 4c...is easier to install than...Alternative 4d (preferred remedy)” due to the need for specialized equipment and trained labor for installation of Alternative 4d. It is recommended that the discrepancy in these statements be corrected.

5. Table 3 (Page 14) – Outstanding comment from review of draft FSA Report: Under “Implementability” for Site 3, Alternative 4d is given a rating of “moderate-high” while all other alternatives with the same implementability criteria (ie., Alternatives 6a and 6b) are rated as “moderate”. On what basis is Alternative 4d given a higher implementability rating over alternatives with like criteria? Please modify rating(s) as appropriate.

6. Table 3 (Page 14) -- Outstanding comment from review of draft FSA Report: Under “Reduction of Toxicity, Mobility, or Volume through Treatment” for Site 5, the overall rating for some of the alternatives is very confusing as compared to the others with like criteria. For example, under Alternatives 4c, 4d, and 5a, it states “prevents almost all of the infiltration” with all other criteria provided being the same; but the rating for Alternative 5a is “moderate-high” while the other two are “high”. Also, for Alternatives 5b, 6a, and 6b it is stated “high reduction in infiltration” with all other criteria the same; but the rating for Alternative 5b is “moderate” while the other two are “high”. What are the rationale for these discrepancies? Please modify the ratings as appropriate.

7. Table 3 (Page 14) -- Outstanding comment from review of draft FSA Report: Under “Implementability”, Alternatives 4d, 6a, and 6b are rated as “moderate-high” for Site 5 while Alternatives 6a and 6b (see comment 5 above regarding 4d under Site 3) are rated as “moderate” for Site 3. The implementability rating provided in Table 3 for Site 3 would seem to be the more

appropriate rating for these alternatives. It is recommended that this discrepancy be corrected.

8. Table 3 (Page 14) -- Outstanding comment from review of draft FSA Report: Under "Costs" for Site 5, Alternative 6a is rated as "moderate" at \$6.5 million while Alternative 4d is rated at "low" at the same costs. What is the rationale for this discrepancy? Please modify the ratings as appropriate.